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June 21, 2005

FEDERAL ELECTION COMMISSION COMMISSION COUNSEL

By Facsimile to 202/219-3923

Office of General Counsel Federal Election Commission 999 E Street, NW Washington, D.C. 20463

Re: MUR 5612 - Response to Complaint on behalf of

SEIU International Political Education & Action Fund

Dear Sir or Madam:

SEIU International Political Education & Action Fund ("IPEA") submits this response to the complaint filed against it on May 13, 2005 by the National Right To Work Legal Defense and Education Foundation, Inc. ("Foundation") in this matter. The complaint consists of a Supplemental Affidavit of Stefan Gleason dated May 13, 2005 together with a redacted copy of an SEIU Memorandum which Mr. Gleason states he received from a member of an SEIU Local Union.

Under federal law union treasury funds may be used to support a variety of political activities, including many activities relating to federal elections. The complaint submitted against IPEA does not demonstrate or suggest any improper use of union treasury funds for political purposes. Nor does the complaint even remotely suggest any other possible violation of federal election law by IPEA. The complaint against IPEA should therefore be dismissed.

Sincerely,

Michael B. Trister

cc: Robert Weinberg, Esq. John S. Sullivan, Esq.